

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

HILDA L. SOLIS,	)	
SECRETARY OF LABOR,	)	
UNITED STATES DEPARTMENT OF LABOR,	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	NO. 8:10-cv-355
v.	)	
	)	
DARN DEPENDABLE SERVICES, LLC;	)	
And DEBRA TRAPP; DEBB HOMAN;	)	
and SUE SEEFUS, INDIVIDUALLY	)	
Defendants.	)	

COMPLAINT

Plaintiff brings this action to enjoin Defendants from violating the provisions of section 15(a)(2) of the Fair Labor Standards Act of 1938, as amended (29 U.S.C. § 201 et seq.), hereinafter called the Act.

I

Jurisdiction of this action is conferred upon the Court by section 17 of the Act and by 28 U.S.C. § 1345.

II

Defendant Darn Dependable Services, LLC is a limited liability corporation owned and operated by Debra Trapp, Debb Homan, and Sue Seefus with its principal place of business located at 802 Fort Crook Road South, Bellevue, Nebraska 68005 within the jurisdiction of this Court.

Defendant Debra Trapp resides within the jurisdiction of this Court, is owner of Defendant Darn Dependable Services, LLC, and acts directly or indirectly in the interest of Defendant Darn Dependable Services, LLC in relation to its employees.

Defendant Deborah Homan resides within the jurisdiction of this Court, is owner of Defendant Darn Dependable Services, LLC, and acts directly or indirectly in the interest of Defendant Darn Dependable Services, LLC in relation to its employees.

Defendant Sue Seefus resides within the jurisdiction of this Court, is owner of Defendant Darn Dependable Services, LLC, and acts directly or indirectly in the interest of Defendant Darn Dependable Services, LLC in relation to its employees.

### III

The activities of Defendants referred to in paragraphs II were, and are, related and performed through unified operation or common control for a common business purpose, and have, since January 16, 1997, constituted an enterprise within the meaning of section 3(r) of the Act.

### IV

Since at least 2005, said enterprise has had employees engaged in commerce or in the production of goods for commerce, including employees handling, selling, or otherwise working on goods or materials that have been

moved in or produced for commerce by any person; an annual gross volume of sales made or business done of not less than \$500,000, exclusive of excise taxes at the retail level, separately stated; and, therefore, was and is an enterprise engaged in commerce as defined in section 3(s)(1)(A) of the Act.

V

Defendants Darn Dependable Services, LLC; Debra Trapp, Debb Homan, and Sue Seefus have violated the provisions of sections 6 and 15(a)(2) of the Act by failing to pay to certain employees, in an enterprise engaged in commerce or in the production of goods for commerce, wages at rates not less than \$7.25 per hour.

VI

Defendants Darn Dependable Services, LLC; Debra Trapp, Debb Homan, and Sue Seefus have repeatedly violated the provisions of the Act as alleged in paragraph V above. A judgment permanently enjoining and restraining the violations herein alleged is specifically authorized by section 17 of the Act.

WHEREFORE, cause having been shown, Plaintiff prays judgment permanently enjoining and restraining Defendants, Defendants' officers, agents, servants, employees, and those persons in active concert or participation with

Defendants, who receive actual notice thereof, from  
violating the provisions of section 15(a)(2) of the Act.

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